

April 22nd, 2014

CONFLICT MINERALS POLICY STATEMENT

Phantom Technologies LTD. supports and respects the protection of human rights for all, including the basic human rights of employees and workers. We are committed to sourcing components and materials from suppliers that share our values regarding respect for human rights, integrity, and environmental responsibility and that comply with all applicable legal standards and requirements.

On August 22, 2012, the U.S. Securities and Exchange Commission issued the final conflict minerals rule under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Conflict Minerals Rule").

The Conflict Minerals Rule requires publicly traded companies to report annually the presence in its products of conflict minerals (Tin, Tungsten, Tantalum and Gold, or "3TG") originating in the Democratic Republic of the Congo or adjoining countries . We are committed to complying with the requirements of the Conflict Minerals Rule applicable to us and have taken steps to do so. As Phantom Technologies LTD. does not source conflict minerals directly from mines, smelters ,or refiners and, in most cases, is several levels removed from companies that do, we require the cooperation of our suppliers in the implementation of this policy and in enabling us to timely meet our obligations under the Conflict Minerals Rule.

We are implementing a due diligence program to identify and trace conflict minerals in our supply chain ,based on the procedures provided by the Electronic Industry Citizenship Coalition ("EICC") and the Organization for Economic Cooperation and Development ("OECD").

We have adopted the EICC standardized reporting template and are requiring our suppliers to provide us with completed conflict minerals declarations using this template. As this process proceeds, we will review the information we collect and assess the need to take remedial action based on our values articulated above and our legal obligations. We will also endeavor to work cooperatively with our customers and supply chain partners to assist them in implementing their own conflict minerals programs.

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